

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

SYREETA REDD,

Plaintiff,

v.

Civil Action No. 3:12-cv-00737

**EMPOWERMENT CLINICAL &
CONSULTING SERVICES, LLC,
RUDI JACKSON, AUDREY CAMPBELL
and BRALEY & THOMPSON, INC.,**

Defendants

AFFIDAVIT IN SUPPORT OF REQUEST FOR ENTRY OF DEFAULT

COMMONWEALTH OF VIRGINIA)
) to wit:
CITY OF ROANOKE)

Carrie M. Harris, being duly sworn, makes oath as follows:

1. I am admitted to the bar of this Court and am a member of the firm of Spilman Thomas & Battle, PLLC, counsel for Braley & Thompson. Inc., in the above-captioned case, and I am familiar with its facts and circumstances.
2. Subject matter jurisdiction is asserted in this matter based on federal question jurisdiction pursuant to 28 U.S.C. § 1331.
3. This Court has personal jurisdiction over the Defendant Empowerment Clinical & Consulting Services, LLC ("Empowerment"), as it is a limited liability corporation organized and existing under the law of the Commonwealth of Virginia that conducted business in this jurisdiction.
4. This Court has personal jurisdiction over the Defendants Rudi Jackson and Audrey Campbell as they are individuals and residents of the Commonwealth of Virginia.

**EXHIBIT
A**

5. Proper venue is asserted pursuant to 28 U.S.C. § 1391 in that substantial part of the cause action herein occurred in the Eastern District of Virginia.

6. Braley filed its Cross-Claim against Defendants Empowerment, Rudi Jackson and Audrey Campbell (collectively the "Defendants") on June 3, 2013.

7. The Cross-Claim was served on Rudi Jackson, individually and as Registered Agent for Empowerment Clinical & Consulting Services, LLC, on June 3, 2013, by regular, first-class mail at 2101 Creek Top Way, Chesterfield, Virginia 23236, in accordance with Federal Rule of Civil Procedure 5(b)(2)(C).

8. The Cross-Claim was served on Audrey Campbell, individually, on June 3, 2013, by regular, first-class mail at 5100 Glenbeigh Drive, Richmond, Virginia 23234, in accordance with Federal Rule of Civil Procedure 5(b)(2)(C).

9. The Defendants were obligated to file responsive pleadings to the Cross-Claim no later than June 27, 2013.

10. None of the Defendants have filed any response to the Cross-Claim nor have they appeared and defended this action.

Further, the affiant sayeth not.


Carrie M. Harris

The foregoing was executed in my presence by Carrie M. Harris, this 12th day of November, 2013.


Notary Public

My commission expires: 10/31/2015

Registration No. 179895

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